UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

LAPIN CHILDREN, LLC,

Defendant.

Adv. Pro. No. 10-05209 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including November 30, 2018.

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The purpose of this Stipulation is to provide additional time for the Parties to resolve this

matter through the mediation process as contemplated under the Case Management Procedures

Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and

defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such

rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which

when so signed shall be an original, but all of which shall together constitute one and the same

instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed

an original.

Dated: August 27, 2018

New York, New York

/s/ Nicholas J. Cremona

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Mediator